

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER
LTD.

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE
LIBRARY GENESIS PROJECT d/b/a
LIBGEN.ORG, ALEXANDRA ELBAKYAN,
JOHN DOES 1-99,

Defendants.

Index No. 15-cv-4282 (RWS)

REQUEST FOR ENTRY OF DEFAULT

TO: RUBY J. KRAJICK, CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiffs Elsevier Inc., Elsevier B.V., and Elsevier Ltd. (collectively the “Plaintiffs”) respectfully request entry of default, pursuant to Federal Rule of Civil Procedure 55(a), against Defendants Sci-Hub, Alexandra Elbakyan, The Library Genesis Project, Elibgen.org, Libgen.info, Estrorecollege.org, and Bookfi.org, and the John Doe operators of each of those entities (collectively the “Defendants”) for their failure to appear or otherwise respond to the Complaint in this action within the time specified by the Federal Rules.

All Defendants were served with copies of the Summons, Complaint, and all other initiating documents in this lawsuit between June 23 and June 30, 2015, in the manner provided by the Court’s Order dated June 18, 2015 (Dkt. 15). Plaintiffs filed proof of service on each of

the Defendants with the Court on July 1, 2015 (Dkt. 24 – 30). More than 21 days have elapsed since service was completed. No Defendant has been granted any extension of time to respond to the Complaint. No Defendant has answered or otherwise responded to the Complaint, or served any other responsive pleading on Plaintiffs’ attorneys of record.

A proposed Certificate of Default is submitted for the Court’s convenience.

Dated: February 15, 2017

Respectfully submitted,

DEVORE & DEMARCO LLP

/s/ Joseph V. DeMarco
Joseph V. DeMarco (JD3499)
David M. Hirschberg (DH2718)
Urvashi Sen (US2602)
99 Park Avenue – Suite 1100
New York, New York 10016
(212) 922-9499

*Attorneys for Plaintiffs Elsevier Inc.,
Elsevier B.V., and Elsevier Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of February, 2017, I caused the foregoing Request for Entry of Default and accompanying Declaration, which were filed via the Court's ECF system, to be served on defendants Sci-Hub, Alexandra Elbakyan, The Library Genesis Project d/b/a libgen.org, Elibgen.org, Libgen.info, Estrorecollege.org, and Bookfi.org by email as provided in this Court's Order dated June 18, 2015.

Dated: February 15, 2017

/s/ Joseph V. DeMarco